

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS - FORT WORTH DIVISION**

**THE NAUGHTYS LLC**  
**Plaintiff,**

**v.**

**DOES 1-580,**  
**Defendants.**

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**Case No. 4:21-cv-00492-O**

**SHAN DEFENDANTS' MOTION FOR LEAVE TO FILE**  
**MEMORANDUM IN OPPOSITION TO PLAINTIFF'S BRIEF SUPPORTING**  
**PERSONAL JURISDICTION ONE DAY LATE**

Shan Defendants<sup>1</sup> move this Court for leave to file their *Defendants' Memorandum in Opposition to Plaintiff's Brief Supporting Personal Jurisdiction* ("Memo") one day later than the Court's expedited deadline of August 2, 2021 (ECF No. 126).

1. The undersigned local counsel for the Shan Defendants was unable to revise and file the Memo by August 2, 2021.
2. The undersigned has attempted to confer on this matter, but has not yet received a response from opposing counsel.

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<sup>1</sup> The Shan defendants include: Doe 189 (Shan-s), Doe 201 (NyaKLI ), Doe 206 (Debouor), Doe 218 (GJK-SION), Doe 220 (COL beans), Doe 221 (Mariee), Doe 225 (Fhci-HR), Doe 226 (Vdaye), Doe 228 (CO CO-US ), Doe 232 (milkcha), Doe 238 (ChenJBO), Doe 244 (douk-Quite), Doe 248 (YHCWJZP), Doe 249 (S5E5X), Doe 250 (xatos), Doe 256 (cocounut ), Doe 285 (Ikevan), Doe 301 (Hilyo), Doe 302 (Shimigy ), Doe 307 (TBKOMH), Doe 313 (much MUCHYOU ), Doe 333 (Surgical), Doe 335 (ZEFOTIM), Doe 342 (PIKAqiu33 ), Doe 348 (OFMWBN), Doe 355 (who-canside), Doe 367 (GREFER), Doe 390 (Atlanta1816), Doe 391 (AtlantaMart2005), Doe 395 (bigbigshow2012), Doe 396 (bodhi1998), Doe 402 (CincinnatiStore ), Doe 406 (Denver0806), Doe 411 (e1xytrep), Doe 412 (easyshopping66 ), Doe 413 (eridu905), Doe 414 (eriphorooidesxx), Doe 422 (gilroy2012), Doe 423 (globalfashion2010), Doe 426 (GreatSpringfield), Doe 433 (hongyinlon0), Doe 434 (hotdeal320), Doe 437 (hutrsate51), Doe 443 (KansasDeal ), Doe 460 (Nannouth), Doe 466 (ppktjfa8612), Doe 474 (rockfoilcrabbh), Doe 486 (SZbhkei12), Doe 501 (watch\_deal), Doe 505 (wishmart2014), Doe 511 (xxzfalcon849), Doe 515 (yishengmall2014), Doe 516 (yupaxxs), Doe 526 (bismarck), Doe 527 (montgomery), Doe 532 (Bakheng), Doe 533 (adriaticgo), Doe 538 (ashur80), Doe 560 (yingli520), Doe 561 (yangsuiqwe), Doe 575 (aishengheji), and Doe 576 (Liusaluy).

3. In the interests of justice, Shan Defendants ask that they be allowed their Memo to be entered, which is attached as Exhibit 1.

**PRAYER**

Shan Defendants request that the Court allow their Memo to be considered by the Court.

Respectfully submitted,

NORRED LAW, PLLC

/s/ Warren V. Norred

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Attorney for Plaintiff

**CERTIFICATE OF SERVICE** - I certify that the above was served on all parties seeking service in the instant case via the Court's e-file system on August 3, 2021.

/s/Warren V. Norred

**CERTIFICATE OF CONFERENCE** - I certify that I requested conference with Charles Wallace, Plaintiff's counsel, by email on August 3, 2021, with regard to this Motion, who has not yet responded. Counsel will update the Court when Plaintiff provides a position.

/s/Warren V. Norred

**DECLARATION** - Pursuant to 28 U.S. Code § 1746, I declare under penalty of perjury that the foregoing is true and correct. Executed on August 3, 2021.

/s/Warren V. Norred

Warren V. Norred